



U.S. Department of Justice

United States Attorney
Southern District of New York

MEMO ENDORSED

United States District Courthouse
300 Quarropas Street
White Plains, New York 10601

January 26, 2021

BY ECF AND EMAIL

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Jerome Brooks*, No. 11 Cr. 630 (KMK)

Dear Judge Karas:

The above-referenced matter is currently scheduled for a conference before the Court on January 27, 2021 at 12 p.m. The Government and counsel for the defendant, Jean Barrett, Esq., jointly and respectfully request a 45-day adjournment of the conference for the reasons set forth below.

The defendant has an open criminal case pending in Westchester County, the alleged offense conduct of which forms the basis for the alleged violation of supervised release before this Court. A court appearance in the state case occurred yesterday, January 25, 2021, and the outcome was that the case is now adjourned to February 11, 2021 for what appears to be, based on the docket, a potential hearing or bench trial. Due to the COVID-19 pandemic, however, it is unclear whether that adjournment date and proceeding will remain as scheduled or will be further adjourned. In light of the foregoing, a 45-day adjournment here would allow for additional time to ascertain how the state case will resolve before proceeding on the instant violation petition before the Court.

This is the sixth such request for an adjournment. The first request, submitted on consent on April 16, 2020 in anticipation of a May court date in the defendant's state case, was granted by the Court. The second request, submitted on consent on June 1, 2020, after the May state court date was adjourned to June, was also granted by the Court. The third request, submitted on consent on July 15, 2020, after the June state court date was adjourned and issuance of a new state court date was still pending, was also granted by the Court. The fourth request, jointly made by the

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parties on October 2, 2020, after a new state court date of October 8 was set, was also granted by the Court. The fifth request, jointly made by the parties on November 20, 2020, after a further adjournment of the state court case, was also granted by the Court.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: /s/ Kevin T. Sullivan
Kevin T. Sullivan
Assistant United States Attorney
(914) 993-1924

cc: Jean D. Barrett, Esq.

*Granted. The Court will hold a
teleconference on March 5, 2021 at
11:30 AM*

SO ORDERED


KENNETH M. KARAS U.S.D.J.

1/28/2021